

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

<p>ABIGAIL STARR and LAUREN SNIDER, on behalf of themselves and all others similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>MOWI ASA; MOWI USA, LLC; and MOWI DUCKTRAP, LLC,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. 20-cv-00488-LEW</p>
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**CONSENT MOTION TO STAY PENDING FINAL APPROVAL OF SETTLEMENT**

Plaintiffs Abigail Starr and Lauren Snider (collectively, “Plaintiffs”) respectfully ask this Court to stay this case pending a final determination by the U.S. District Court for the Southern District of New York regarding whether a class action settlement agreement in *Neversink General Store v. Mowi USA, LLC*, No. 1:20-cv-09293 (S.D.N.Y.) (“*Neversink Action*”) should be finally approved.

On March 26, 2021, Defendants Mowi ASA; Mowi USA, LLC; and Mowi Ducktrap, LLC (collectively, “Defendants”) filed a motion to dismiss or stay Plaintiffs’ case (ECF No. 21) in light of a proposed class action settlement in the *Neversink Action*. Plaintiffs continue to oppose dismissal of the instant case for the reasons set forth in Plaintiffs’ opposition to Defendants’ motion to dismiss. (ECF No. 22)

Nevertheless, in light of the *Neversink* court’s May 14, 2021 Order Granting Preliminary Approval of Settlement (ECF No. 26-1), which temporarily enjoins potential class members (such as Plaintiffs) from maintaining actions against Defendants concerning the claims at issue, Plaintiffs

respectfully request that this Court stay this case pending a decision from the *Neversink* court regarding final approval of the proposed *Neversink* class action settlement. Plaintiffs further request that the Court order the parties to file a status report within seven days after the court issues an order on final approval in the *Neversink* matter. Plaintiffs have obtained Defendants' consent to this motion.

DATED: June 1, 2021

**RICHMAN LAW & POLICY**

BY: /s/ Kim Richman

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